



**Vermont American Corporation**  
**Corporate Procurement Department**  
101 South Fifth Street, #2300  
Louisville, Kentucky 40202  
Phone: (502) 625-2000  
Fax: (502) 561-1199

**December 12, 2001**

**Director of Steel Trade Policy  
Trade Policy Staff Committee  
Washington, DC**

**Director of Steel Trade Policy:**

**I am writing a letter of opposition to the Section 201 investigation regarding imported Tool Steel, High Speed Steel and Specialty products.**

**The Vermont American Corporation, headquartered In Louisville, KY, is a manufacturer of power tool accessories (drill bits, router bits, taps & dies, etc.).**

**We are under extreme pressures by our customers to supply a high quality product at a competitive price. VA has been able to accomplish this by importing a product that is competitive in price; more efficient to manufacture and is more readily available than the only domestic source.**

**I wish to emphasize the words ‘only domestic source’! There are only four mills in the world that produce high-speed steel. Up to a year ago, VA use to source from the only domestic source. VA was experiencing major problems with material availability and product quality.**

**I found a source out of Austria that is able to supply readily available product with the highest quality at a competitive price. This source has allowed VA to maintain current customers as well as gain additional market share.**

**VA spends in excess of \$19 million a year in all forms of steel. The steel commodity is one of VA’s largest commodities with imported Tool Steel, High Speed Steel and Specialty products equaling \$3 million. The remaining \$16 million are different forms of steel from domestic sources.**

**Because of VA's end products, steel becomes VA's biggest cost driver. I ask that the USITC focuses closely on not where and what has happened to steel producers in the past; but what is going to happen to the steel producer's customers in the future.**

**VA is in jeopardy of losing millions of dollars if we are forced to use an inferior, but domestic, product! Very likely resulting in a great loss of jobs to overseas producers.**

**I ask for your assistance by requesting an exemption for the high-speed steel product. I have attached a copy of an affidavit that was submitted to the ITC.**

**Feel free to contact me with any questions.**

**Thanks,**

**Keith E. Cockrum  
Commodity Manager  
Corporate Procurement  
Phone: 502-625-2134  
Fax: 502-560-6134  
E-mail: keith.cockrum@vermontamerican.com**